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SOUTHERN INYO HEALTHCARE DISTRICT

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

11 In re Case No. 1:16-10015-FEC
12 SOUTHERN INYO HEALTHCARE Chapter 9
DISTRICT,
13 WGG-7
Dakota

MOTION TO CONFIRM SEVENTH AMENDED PLAN FOR ADJUSTMENT OF DEBTS OF SOUTHERN INYO HEALTHCARE DISTRICT

**[Memorandum of Law and Declarations
in Support Filed Concurrently]**

Hearing Date:

Date: May 19, 2020
Time: 1:30 p.m.
Place: 501 I. Street
Sacramento, CA 95814
Courtroom 28

23 Southern Inyo Healthcare District (“Debtor” or “District”) moves (“Motion”) for an
24 order confirming its Seventh Amended Plan for Adjustment of Debts of Southern Inyo
25 Healthcare District (the “Plan”) as the Plan satisfies all of the requirements of the
26 Bankruptcy Code for confirmation and has been accepted by all creditors who timely
27 voted. In support of the Motion, the District relies upon the following being filed
28 concurrently with this Motion:

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1 (i) Memorandum Law in Support of Confirmation of Seventh Amended Plan for
2 Adjustment of Debts of Southern Inyo Healthcare District;
3 (ii) Declaration of Jeffrey I. Golden in Support of Confirmation of Seventh
4 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
5 (iii) Declaration of Jaque Hickman in Support of Confirmation of Seventh
6 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
7 (iv) Declaration of Peter Spiers in Support of Confirmation of Seventh Amended
8 Plan for Adjustment of Debts of Southern Inyo Healthcare District;
9 (v) Declaration of Don Fife in Support of Confirmation of Seventh Amended
10 Plan for Adjustment of Debts of Southern Inyo Healthcare District; and
11 (vi) Declaration of Kelly Adele Regarding the Tabulation and Analysis of Ballots
12 Cast in Acceptance or Rejection of the Seventh Amended Plan for
13 Adjustment of Debts of Southern Inyo Healthcare District;

14 The District also relies upon the following previously filed pleadings:

15 (vii) The Plan;
16 (viii) Seventh Amended Disclosure Statement with Respect to the Seventh
17 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
18 (ix) Exhibits to Seventh Amended Plan for Adjustment of Debts of Southern Inyo
19 Healthcare District;
20 (x) Declaration of Ed Rodieck re Service of (1) Seventh Amended Plan for
21 Adjustment of Debts of Southern Inyo Healthcare District; (2) Seventh
22 Amended Disclosure Statement with Respect to the Seventh Amended Plan
23 for Adjustment of Debts of Southern Inyo Healthcare District; (3) Exhibits to
24 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
25 Healthcare District; (4) Order Approving Seventh Amended Plan for
26 Adjustment of Debts of Southern Inyo Healthcare District and Plan
27 Confirmation Scheduling Order; and (5) Ballot for Accepting or Rejecting

1 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
2 Healthcare District; and
3 (xi) Supplemental Proof of Service for (1) Seventh Amended Plan for
4 Adjustment of Debts of Southern Inyo Healthcare District; (2) Seventh
5 Amended Disclosure Statement with Respect to the Seventh Amended Plan
6 for Adjustment of Debts of Southern Inyo Healthcare District; (3) Exhibits to
7 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
8 Healthcare District; (4) Order Approving Seventh Amended Plan for
9 Adjustment of Debts of Southern Inyo Healthcare District and Plan
10 Confirmation Scheduling Order; and (5) Ballot for Accepting or Rejecting
11 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
12 Healthcare District.

13 Dated: April 21, 2020

WEILAND GOLDEN GOODRICH LLP

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15 By: /s/ Jeffrey I. Golden
16 JEFFREY I. GOLDEN
17 Attorneys for Debtor
18 SOUTHERN INYO HEALTHCARE
19 DISTRICT
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